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August 17, 2020

**BY ECF**

Honorable Joan N. Ericksen, U.S.D.J.  
United States District Court  
District of Minnesota  
300 South Fourth Street  
Minneapolis, Minnesota 55415

**Re: Ciofoletti, et al. v. Securian Financial Group, Inc., et al.  
Case No.: 18-cv-03025**

Dear Judge Ericksen:

Having obtained the Court's permission, attached as supplemental authority in opposition to the Rule 12(b)(2) and 12(b)(6) motion filed by Defendant Shurwest, LLC (ECF No. 134) are two decisions of the Court of Common Pleas, Anderson County, South Carolina (The "S.C. Court").

Respectfully,

A handwritten signature in black ink, appearing to read 'Lee Squitieri', with a long horizontal flourish extending to the right.

Lee Squitieri

LS:mm  
Encls,